



# REGIONALSAN

TAKING THE WASTE OUT OF WATER

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March 30, 2017

Delta Independent Science Board  
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## Subject: Review of the Monitoring Enterprise in the Sacramento-San Joaquin Delta, February 14, 2017 Draft Monitoring Prospectus

Dear Board Members:

Regional San is pleased to submit comments on the Delta Independent Science Board's (Delta ISB) draft prospectus to undertake a broad and comprehensive review of monitoring in the Delta (Draft Monitoring Prospectus). In addition to our own compliance monitoring, we are an active member of the ongoing Delta Regional Monitoring Program (Delta RMP) and in the past have led efforts on the Sacramento and American Rivers to perform a Coordinated Monitoring Program (CMP, 1991-2007). Regional San supports monitoring that is effective, necessary, efficient, and that achieves the intended purpose of informing policy and management decisions.

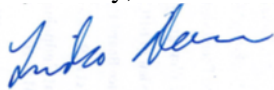
We value the Delta ISB's review and recommendations on Delta scientific issues and, in this case, on the Delta-specific monitoring activities. We support a comprehensive review of major monitoring programs with the goal of enhancing our understanding of water flow and other environmental factors influencing ecosystem health in the Delta, and our ability to manage those factors to achieve management and policy goals. We want to make sure that this review has a clearly stated purpose and that it takes place in an open and transparent manner. Therefore, we are providing the following comments on the Draft Monitoring Prospectus.

1. Over the years there have been many inventories, reports, and recommendations on the monitoring activities in and around the Delta. We suggest that an inventory of those reports and recommendations be compiled as a first step. To achieve this, an inventory of the current data portals should be developed and evaluated. There are many ongoing efforts such as: the Monitoring Council's Estuary portal, the San Joaquin River portal, the Sacramento River Watershed portal, the EcoAtlas, the Bay-Delta Live portal, etc. In addition, there are also the ongoing efforts to comply with AB-1755 "The Open and Transparent Water Data Act" that should be taken into consideration as well.
2. The review report states that one of the anticipated outcomes is "to meet the needs of management and policy decisions." It is not clear what management and policy questions the report intends to answer or how and who helped develop those questions. We believe these decisions and questions should be clearly identified, with attribution to the programs where they were derived. Ideally, this effort should be a collaborative process that is comprised of stakeholders having Delta policy interests.

3. The overall plan for implementing the recommendations of the proposed review needs to be clearly stated. It is unclear whether the proposed review will result in changes to Delta monitoring programs. Given that most ongoing monitoring programs have been designed, implemented and funded to meet specific goals and objectives, is there a governance strategy or funding mechanism in place that would encourage monitoring programs to modify their current approach based on findings and recommendations of the proposed review?
4. Understanding the investment being made in this effort from this initial review, to the long term implementation of the recommendations is important. Therefore, we recommend the report include what the overall budget is for the project and how it will be funded. Providing this budget/funding information will help the Delta ISB be more transparent to interested stakeholders.
5. The Draft Monitoring Prospectus states that its purpose is to make recommendations on how to advance monitoring data to support implementation of adaptive management and assessments of performance measures. The source and content of these adaptive management programs and performance measures should be clearly stated.
6. The Delta RMP provides an example how stakeholder involvement can lead to an effective water quality monitoring program assessing system-wide trends in Delta water quality, meeting multiple stakeholder needs. A key element of the Delta RMP is the open transparent process that includes participation from a broad assemblage of stakeholders in producing objective and cost-effective scientific information critical to understanding regional water quality conditions and trends in the Delta.
7. It should be noted that many consultants and non-profit groups are currently involved in various monitoring activities in the Delta. It will be important to place safeguards in the RFP to avoid any possible conflict of interest.
8. Finally, we urge the Delta ISB to keep the process of generating any reports and recommendations transparent and open to public input. The approach that the Delta ISB will use to solicit input from the diverse assemblage of parties involved in Delta monitoring should be clearly stated.

As a steward in water quality monitoring for the Delta, we look forward to working with the ISB in evaluating the Monitoring Enterprise in the Delta, with the overall goal of leading to better informed management and policy decisions. Regional San appreciates the opportunity to comment on the Draft Monitoring Prospectus. If you have any questions, please contact me, 916-876-6030, or [dornl@sacsewer.com](mailto:dornl@sacsewer.com).

Sincerely,



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